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FIBER TECHNOLOGIES NETWORKS, L.L.C.	)	
140 Allens Creek Road	)	
Rochester, NY 14618	)	
	)	
Complainant,	)	
	)	
v.	)	D.T.E. 01-70
	)	
TOWN OF SHREWSBURY ELECTRIC	)	
LIGHT PLANT	)	
100 Maple Avenue	)	
Shrewsbury, MA 01545-5398	)	
	)	
Respondents.	)	
	)	

Fiber Technologies Networks, L.L.C. requests that the Town of Shrewsbury Electric Light Plant provide the data, information, and documents described below. Fibertech incorporates by reference the Department's ground rules concerning information requests.

The Definitions and Instructions in First Set of Information Requests of Fiber Technologies Networks, L.L.C. to Town of Shrewsbury Electric Light Plant apply. In addition, “SCC” means Shrewsbury Community Cablevision and its predecessors, successors, and affiliates.

## **INFORMATION REQUESTS**

1. Please state whether Thomas Josie or any board member or employee of SELP made any communications regarding Fibertech via email. If so, please produce such communications.
2. Refer to the documents produced in SELP Response to Fibertech 1-1
  - a. Please explain how the Petition to Install and Maintain Fiber Optic Facilities dated September 28, 2001; the letter from Lisa J. Jarosinki to Daniel Margado [sic] dated October 12, 2001; and the letter from Mr. Morgado to Ms. Jarosinki dated October 15, 2001, came into the possession, custody, or control of SELP;
  - b. Please identify the author of the Proposed Revision 7/2001, Proposed Terms and Conditions Contract Between SELP and Fiber Tech Fiber Cable Agreement, and/or the author of the revisions reflected in that document, and explain the origin of such revisions.
  - c. Please produce the legal opinion by K. Barna referred to in the Memorandum from T.R. Josie to the Light Commission dated October 16, 2000.
  - d. Please produce the research by K. Barna referred to in the memorandum from T.R. Josie to D. Morgado and J. LeBeaux dated May 15, 2001, and the “[a]dditional back-up information” referred to on the third page of such memorandum as attached.
3. Refer to SELP Responses to Fibertech 1-2. Please produce all pole attachment agreements with Verizon, Digital, and MCI WorldCom and, with respect to the Digital agreement (a) all documents reflecting communications with Digital concerning

negotiation of this agreement and (b) all other documents referring or relating to Digital's status (or lack of status) as a "licensee" within the meaning of G.L. c. 166 § 25A.

4. Refer to SELP Response to Fibertech 1-3. Please produce all documents relating to requests by NEESCom and Adelphia Business Solutions for pole attachments.
5. Refer to SELP Response to Fibertech 1-4. Does SELP also provide long distance service and Internet access?
6. Refer to SELP Response to Fibertech 1-5. Please describe the number of strands of fiber and number of fiber miles of fiber optic cable each of SELP and SCC use, state whether either of them leases or has leased any capacity on such cable to third parties and, if so, identify the customers to whom they have leased such capacity. If SELP or SCC has leased or leases any such capacity, please state whether the customers supply any electronic equipment for use in generating signals transmitted on the fiber optic cable and explain what electronic equipment they supply.

Respectfully submitted,

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